

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

OCT - 9 2014

CLERK, U.S. DISTRICT COURT

By Deputy NT

Pineto V. Woodard

Plaintiff

v.

City Of Dallas Police Dept

Defendant

3-14CV3644-N
Civil Action No.

COMPLAINT

My 14th Amendment Rights have been constantly violated by the Dallas Police Dept. I was in a court proceeding in 2009 concerning my son Pineto Woodard II, at that time my child's mother Latoya Ellison was ordered to bring my son to me at Union Station from Ft. Worth, Tx from the hours of 5 PM to 7:30 AM everyday week and for my child's mother to have him from the hours of 7:30 AM to 5 PM. In September of 2009 when she brought my son to me his hand and arm was severely burnt where doctors had to remove skin from his buttock and graft it on his hand do to his mother negligence. At that time she grab my son in rage out of my arms and retrieve back to a awaiting automobile and drove off. I called the Police and made report of the incident and injuries to my son. The report was interfering with child custody and injuries to a child. The Dallas Police Dept never did anything concerning my complaint of these matters in which at that time the officer taking the report said it would be referred to child protective services as well. In October of 2011 the Dallas Police Dept "about 9 officers and a child protective services case worker came to my home to arrest me concerning the burns to my son Pineto Woodard II hand and arm that previously reported but no actions were taken to exercise my rights what so ever by the Dallas Police Dept. A child protective services case was opened on me at that time in which I would be incarcerated right now if they wouldn't have went formally a found that I formally reported it to police on record. Over the last 5 year I have been arrested over malicious and fictitious trumped charges that have been all dismissed and I have also been alienated from my son's with this trickery. The Police has made me lose my jobs by coming there formally on fictitious allegations. Ms. Latoya Ellison has perjured her self on record but nothings still hasn't been done so I see know other alternative but civil litigation. Is there a law that say females or police should have a double standard.

* Attach additional pages as needed.

Date _____

Signature Mr. Pineto Woodard

Print Name Pineto V. Woodard

Address 511 Akard #418

City, State, Zip Dallas, Texas 75201

Telephone 214-254-0580

JS 44 (Rev. 09/11)

CIVIL COVER SHEET

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS <u>Pineto V. Woodard</u>	DEFENDANTS <u>City of Dallas Police Department</u>
(b) County of Residence of First Listed Plaintiff <u>Dallas</u> <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small>	County of Residence of First Listed Defendant <u>Dallas</u> <small>(IN U.S. PLAINTIFF CASES ONLY)</small> <small>IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</small>
(c) Attorneys (Firm Name, Address, and Telephone Number) _____ <small>(If Known)</small>	

II. BASIS OF JURISDICTION <small>(Place an "X" in One Box Only)</small> <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 3 Federal Question <small>(U.S. Government Not a Party)</small> <input type="checkbox"/> 4 Diversity <small>(Indicate Citizenship of Parties in Item III)</small>	III. CITIZENSHIP OF PRINCIPAL PARTIES <small>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</small> <table style="width: 100%;"> <tr> <td style="width: 50%;"> Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country </td> <td style="width: 50%;"> <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 </td> </tr> <tr> <td style="width: 50%;"> Incorporated or Principal Place of Business In This State Incorporated and Principal Place of Business In Another State Foreign Nation </td> <td style="width: 50%;"> <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 </td> </tr> </table>	Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3	Incorporated or Principal Place of Business In This State Incorporated and Principal Place of Business In Another State Foreign Nation	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3
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V. ORIGIN <small>(Place an "X" in One Box Only)</small> <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district <small>(specify)</small> <input type="checkbox"/> 6 Multidistrict Litigation	Cite the U.S. Civil Statute under which you are filing. <small>(Do not cite jurisdictional statutes unless diversity):</small> <u>14th Amendment Violated</u>
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VI. CAUSE OF ACTION Brief description of cause: _____	Cite the U.S. Civil Statute under which you are filing. <small>(Do not cite jurisdictional statutes unless diversity):</small> <u>14th Amendment Violated</u>
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VII. REQUESTED IN COMPLAINT:	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ <u>1,000,000</u> CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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VIII. RELATED CASE(S) PENDING OR CLOSED: <small>(See instructions):</small>	JUDGE _____ DOCKET NUMBER _____
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DATE _____ SIGNATURE OF ATTORNEY OF RECORD _____

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____